UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MISSOURI

Creative Compounds, LLC,)
Plaintiff,)
v.) Case No. 18-cv-00089-SNL3
IQ Formulations, LLC,)
Defendant.	<i>)</i>)

DEFENDANT'S CONSENT MOTION TO EXTEND DEADLINE TO RESPOND TO COMPLAINT

NOW COMES the Defendant, **IQ Formulations**, **LLC**, by and through its undersigned counsel, and for its Consent Motion to Extend the Deadline to Respond to the Complaint, states as follows:

- 1. The Plaintiff filed this action, styled as a "Complaint for Declaratory Judgment on Non-Liability," on April 23, 2018 (Doc. #1).
- 2. The Defendant, IQ Formulations, LLC ("IQ"), was served on May 7, 2018 (Doc. #4). Therefore, the deadline for IQ to file its responsive pleading is Monday, May 28, 2018, which is also the Memorial Day holiday.
- 3. IQ respectfully moves this Court for a twenty-eight (28) day extension of the deadline for IQ to file its responsive pleading, or up to and including June 25, 2018. Good cause exists for the requested extension since IQ was only recently served with the Complaint and requires a reasonable amount of time to prepare a meaningful responsive pleading.
- 4. Prior to filing this motion, the undersigned consulted with counsel for the Plaintiff regarding IQ's intention to file this motion requesting the extension. Counsel for the Plaintiff has consented to this request.

WHEREFORE, based on the foregoing, IQ respectfully requests that this Court grant its Motion and enter an Order extending the deadline for IQ to respond to the Complaint by twenty-eight (28) days, up to and including **June 25, 2018**, and for any and all other relief this Court deems necessary and in the interest of justice.

Dated: May 24, 2018 Respectfully Submitted,

By: /s/ John F. Cooney
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ATTORNEYS FOR DEFENDANT IQ FORMULATIONS, LLC

CERTIFICATE OF SERVICE

The undersigned certifies that on May 24, 2018, the foregoing was sent via U.S. Mail and was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

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/s/ John F. Coonev